

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

THE UNITED STATES OF AMERICA

*

v.

*

Civil No. SAG 14-1065

ONE 2010 DODGE RAM

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MOTION TO WITHDRAW AS COUNSEL

Rami Brothers, Inc, through counsel, hereby moves this Honorable Court for an Order permitting counsel to withdraw from representing Rami Brothers Inc., pursuant to Civil Local Rule 101. In support of this Motion, the following is provided:

1. Regrettably, counsel cannot explain his reasons for this Motion, given the ethical and constitutional rules that guide counsel's conduct.
2. Under Civil Local Rule 101, counsel certifies that the name and last known address of the client is: Rami Brothers, Inc., 9126 Bengal Road, Randallstown, MD 21133.
3. Counsel certifies that as of today, counsel sent written notice via Federal Express and email advising Rami Brothers, Inc., of counsel's withdrawal, the need for new counsel and the possibility of a dismissal or a default judgment.

Respectfully submitted,

/s/

Kobie Flowers
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Washington, DC 20006
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Fax: (202) 742-5948
kflowers@flowerslaw.com

Dated: January 20, 2015

CERTIFICATE OF SERVICE

I hereby certify that, on January 20, 2015, a copy of the Motion to Withdraw was served on all counsel of record via the ECF system.

/s/ _____
Kobie Flowers